




STATE OF INDIANA



Eric J. Holcomb, Governor
Devon McDonald, Executive Director

TO: All ICJI Staff and Subgrantees

FROM: Devon McDonald, Executive Director 

RE: Project Modification Requests
Grant Management Directive 3

EFFECTIVE DATE: September 20, 2019 – Revised July 7, 2020

When a subgrantee determines that a Project Modification Request (“PMR”) is the necessary course of action to achieve the program purpose, there are numerous ICJI policies and procedures the subgrantee must adhere to in order to remain in compliance and for ICJI to consider the merits of the PMR. This directive will set forth many of these policies and procedures governing the PMR process.

No PMRs During the Last 30 Days of the Grant

All ICJI grants have a prescribed period of performance. This period of performance is set forth in all grant agreements between ICJI and subgrantees. Generally, ICJI will not approve any PMR submitted within the last 30 days of the grant period of performance. Exceptions to this policy will be granted at the discretion of ICJI’s Executive Director.

PMRs Are Not Retroactive

Subgrantees are responsible for actively managing all grants they receive from ICJI. Subgrantees need to identify the necessity for a PMR in a timely fashion and subsequently submit any PMR in the ICJI electronic grant management system. ICJI will capture the date the PMR is submitted. If approved, the PMR will become effective the date it was submitted. The original budget approved by ICJI is the approved budget until a PMR is approved. The new budget approved via the PMR will become the budget in effect until such time as a new PMR is submitted and approved by ICJI.

ICJI recognizes some circumstances arise that are completely beyond the control of the subgrantee, such as a delay in grant funding. These circumstances necessitate a PMR which would become effective on a specified date that is prior to the PMR’s submission. When such circumstances arise, ICJI will exercise discretion in approving such retroactive PMRs.

Grant Funds Cannot be Added to the Grant Via the PMR Process

The PMR process is not the appropriate mechanism to increase the amount of a grant award. The only mechanism to increase grant funds to an existing grant is by amending the grant agreement. This is a defined legal process that is wholly outside the PMR workflow and is determined based upon available funding. If funds are added through an amendment, your ICJI grant manager will work with you to ensure that the funds are correctly added to the existing approved budget in the ICJI electronic grant management system.

Personnel Vacancies

Every organization experiences some degree of staff turnover. ICJI must be notified within 10 business days of the date a grant-funded employee's position becomes vacant. The subgrantee can satisfy this requirement by using the Name Change feature contained within ICJI's electronic grant management system.

The subgrantee also has 10 business days from the new grant-related employee's start date to inform ICJI of the name of the new grant-related person. The new employee must have the same job title and duties as the grant-related employee who left the employ of the subgrantee. If the new employee is making the same salary or hourly rate as the former grant-related employee, the subgrantee can effectuate the name change by using the Name Change feature contained within ICJI's electronic grant management system. If the new employee's salary or wages is different than the former grant-related employee (higher or lower), a PMR must be completed by the subgrantee to capture not only the change in employee name but also the new rate of pay. Failure to notify ICJI of a new grant-related employee's start date within the 10 business days, will result in ICJI disallowing any fiscal claims concerning that employee including, but not limited to, salary/wages, benefits, and travel expenditures.

Reduction of Services to Victims

A PMR concerning any grant administered by ICJI for the programmatic purpose of serving the needs of victims will be closely scrutinized if the PMR seeks to reduce or eliminate any services to victims. A PMR of this nature will not be automatically denied, but the need for the reduction or elimination of services to victims must be abundantly compelling and clearly delineated in the PMR prior to the approval of the PMR. It is strongly suggested that if this scenario arises, you contact your ICJI grant manager as quickly as possible so that a collaborative process can be started that will address the needs of the subgrantee and ICJI.

PMRs Concerning Match

The need to specifically articulate match expenditures in a subgrantee's approved budget is the same when a circumstance arises that a subgrantee needs to change the source of match. The only allowable match is the specific match set forth in the approved grant budget. Any deviations or substitutions of match without ICJI approving a PMR to change the source of match will result in a match shortage and the need to repay grant funds to ICJI.

Movement of 10% of the Grant Funds

While ICJI recognizes the potential need to perform a budget modification throughout a grant's period of performance, the amount of grant funds that can be moved is not without limitation. Assuming all the criteria set forth in this grant management directive or any other rule, law, policy, or directive governing grants administered by ICJI is satisfied, a subgrantee may be authorized to move up to, but not to exceed, 10% of the grant funds approved in the original budget by the ICJI Board of Trustees.

Subsequent PMRs will be evaluated on their own merits and the movement of grant funds set forth in the preceding approved budget may be subject to the criteria in this grant management directive, as well as rules, laws, policy, or directives, governing grants administered by ICJI.

No Percentage Restriction on Modifying Match

If a subgrantee needs to modify the source of match contained in the approved grant budget, the subgrantee may modify any or all of the match within the confines of 2 C.F.R. Part 200; the Department of Justice Grants Financial Guide; and all rules, regulations, laws, and directives governing grants administered by ICJI.

The Effect of PMRs on a Subgrantee's Risk Assessment

ICJI maintains a record of the number of PMRs submitted per subgrantee and per grant. That information is taken into account when looking at a subgrantee's ability to manage grants and maintain internal controls.

Effective Date

This Grant Management Directive is effective on the date set forth above. Unless specified, this Grant Management Directive supersedes other ICJI policies and procedures concerning the same topics set forth in this Grant Management Directive. Questions or concerns by subgrantees should be addressed to your ICJI Grant Manager.